

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN)
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This document relates to:

Chang Don Kim, et al. v. Islamic Republic of Iran, No. 1:18-cv-11870 (GBD) (SN)

**DECLARATION OF JERRY S. GOLDMAN, ESQ. IN SUPPORT OF PLAINTIFFS’
MOTION FOR CORRECTIONS TO PARTIAL FINAL JUDGMENT**

Jerry S. Goldman, Esq., hereby states under penalty of perjury that:

1. I am an attorney representing the *Kim* plaintiffs in the above-captioned litigation, and I submit this declaration in support of the *Kim* plaintiffs’ Rule 60(a) Motion for Corrections to Partial Final Judgment against the Islamic Republic of Iran at ECF No. 5049.
2. The source of my information and the basis for my belief in my statements contained herein are my personal involvement in this matter, my firm’s representation of the *Kim* plaintiffs in connection with the September 11, 2001 terror attacks, other court records relating to the multi-district litigation to which the *Kim* plaintiffs are parties, conversations had with family members to the *Kim* plaintiffs, file records, and conversations with counsel to other September 11th plaintiffs.
3. Plaintiffs submit this Rule 60(a) Motion for Corrections to Partial Final Judgment in light of our becoming aware that lines 47-52 of Exhibit A to ECF No. 5049 incorrectly list the 9/11 victim’s name as John Christopher Henwood Jr. The correct name of the 9/11 victim is John Christopher Henwood (without “Jr.” at the end).
4. An administrative error resulted in the misspelling of the 9/11 victim’s name.

5. The correction requested by Plaintiffs is clerical in nature, does not raise issues with the substantive judgment contained in ECF No. 5049, and will not in any way change the Court's disposition.

6. For the foregoing reasons, plaintiffs respectfully request that the Court, pursuant to Fed. R. Civ. P. 60(a), correct lines 47-52 of Exhibit A to ECF No. 5049 to change the name of the 9/11 victim from "John Christopher Henwood Jr." to "John Christopher Henwood."

Dated: New York, New York
May 5, 2022

/s/ Jerry S. Goldman
Jerry S. Goldman, Esq.